REMARKS

Consideration of the application is respectfully requested. Amendments are made pursuant to 37 CFR 1.121.

STATUS OF THE CLAIMS

Claims 11-18 are pending.

Claims 11-18 stand rejected.

Claims 11 and 15 are currently amended.

RESPONSE TO ARGUMENTS

In paragraph 3 of the Office Action, in response to Applicants' arguments, the Examiner states on page 4, lines 9-17 that:

> *Han recited "when the caller at the site of the central office subsequently dial the number of a desired extension subscriber or the number of an extension group to which the extension subscriber belongs ... the voice message is then announced, thereby reporting the incoming call" (see col. 6, lines 46-57). Thus, an extension group is known to contain at least 2 telephone extensions. When the voice message is announced to the extension group, it is outputted over that group. Furthermore, the above recited passage clearly indicated that the caller know the desired extension or extension group when initiate the call. Therefore, Han clearly read on applicant's limitation as claimed.*

The Examiner's attention is directed to column 6, lines 30-36, of Han where it explicitly states that:

> *the broadcasting unit 123 being connected to the central line circuit 117 where a voice paging channel is established. The voice message from the caller is reproduced by the broadcasting unit 123.* (Emphasis added)

Han **does not** describe the "*broadcasting unit 123*" as being a telephone or a group of telephones such that "*telephones in the group receive and play the voice message from the first telephone automatically,*" as claimed in the subject application. The passage at column 6, lines 46-57 makes a general or a summarizing statement that "*the voice message is then*

announced, thereby reporting the incoming call." Neither the passage nor the summarizing statement, describe the details set forth in columns 3, 4, 5 and column 6, lines 1-39 of Han. Such passage in Han by itself **does not** meet the claim limitations. The Examiner's attention is directed to column 4, lines 1-20, column 5, lines 30-40, and column 6, lines 13-39 regarding the "*announcement*" of information from the caller and the operation of the "*broadcasting unit 123*" to reproduce or play such announcements.

In response to Applicants' arguments, the Examiner states on page 4, lines 18 through page 5 that:

> *Regarding applicant's argument that "Han patent is not shown or describe as connected to the subscriber circuit 115 of Han, such subscriber circuit having the telephones or subscribers connect thereto". Accordingly, the examiner respectfully disagrees. Han's disclosure clearly suggested "central processing unit 111 controls subscriber circuit 115 to send an output from ring generator 116 to telephone set of a desired extension subscriber (see col. 5 lines 41-50). It should be noted that the ringing signal is applied to the extension subscriber when the automatic attendant function is not used. Thus, when the automatic attending function is used, voice message is generated in place of the ringing signal.*

The above quote is incorrect. Applicants are at a loss to explain why the Examiner has again, as in his Office Action dated November 26, 2002, incorrectly quoted what the Applicants first wrote in their Amendment dated September 9, 2002. Applicants refer the Examiner to the comments made at pages 4-5 of their Amendment dated February 26, 2003, regarding the Examiner's selective and incomplete quoting of what Applicant previously wrote.

CLAIMS

Rejection under 35 USC 103(a) as being unpatentable over Han (US 5,991,397) in view of Turnbull et al. (US 6,008,362) and Heep et al. (US 4,996,709)

In paragraphs 1-2 of the Office Action, the Examiner rejected Claims 11-18 under 35 U.S.C. 103(a) as being unpatentable over Han (US 5,991,397) in view of Turnbull et al. (US

6,008,362) and Heep et al. (US 4,996,709). Applicants have amended independent Claims 11 and 15 to better clarify Applicant's invention. The amendments serve to clarify that the "*first telephone*" and the "*group of telephones*" are all part of the "*multiline KSU-less telephone system.*"

Amended Claim 11 reads as follows:

> *11. A multiline KSU-less telephone system having a plurality of telephones for providing a paging feature, comprising:*
> *a first telephone of the plurality of telephones for selecting a group of telephones from the plurality of telephones in the KSU-less system;*
> *a half duplex channel in the system;*
> *the first telephone initiating a voice message to the group of telephones using the half duplex voice channel in response to a user request; and telephones in the group receive and play the voice message from the first telephone automatically regardless of receiving user action and wherein after playing said voice message, one telephone in the group answering the first telephone initiates a two–way conversation with a user of said first telephone.*
> (Emphasis added)

Applicant's Invention

The operation of the paging feature of the KSU-telephone system is described in the specification on page 14, line 23 to page 16, line 5 as follows:

> *Fig. 11A illustrates the process flow of a paging telephone. At step 111, the telephone is assigned a group number in which it belongs in system 1 when the telephone is first powered up and being set up. At step 112, to initiate a group paging feature, a user of the telephone would either pick up a handset of the telephone or activate a speaker phone.*
>
> *The user may then select to page all the telephones in system 1 or select a group number to page, as shown in step 114. This may be accomplished via keyboard 32 and LCD 33 of system 1 shown in Fig. 2.*
>
> *Once a group is selected, microcontroller 29 of the paging telephone will then broadcast a "page on" command as shown in element 509 of Fig. 5. This command has an Operand 2, which contains the group number that this page is meant for. Once this command is sent, a go ahead beep will be sounded. After the user has heard this beep the user can then speak his or her paging message, as shown in steps 116 and 118. This paging message will be carry on the half-duplex audio voice channel carried on L2 of the system, as described in detail above. The page will end when the paging telephone is hung up by the user or will end automatically 30 seconds after the page, which ever is faster. The page is terminated when the paging unit sends a "page off" command as shown in 510 of Fig. 5.*

Fig. 11B describes a receiving process of the group paging feature. At the receiving end, a telephone in the group being page will realized that it is being paged by the page on command sent, as described above. Once this command is received at a telephone belongs to the group, an alert tone will be generated to a user, as shown in step 122. The telephone will also automatically connect the half-duplex paging channel to the speakerphone of the paged telephone, so that the voice message is heard from the speaker, as in step 124. The paged telephone will also display the originating ID, which can be obtained from the page on command, on display 33 of the telephone. The user of the paged telephone after having heard the page message, may also initiate a 2-way conversation with the paging telephone by simply answering the telephone. A two way intercom is set up by the receiving telephone sending a "Intercom on command" shown in 511 of Fig 5. As discussed above, intercom communications are carried on two full-duplex voice channels by transceiver 22 of Fig. 2.

Han

The system of Han, shown in FIG. 1, is a "*switching system*" having an automatic attendant function (column 3, line 9-11). The entire description of Han is a function of a "*switching system*" performing various operations including sending a ring signal to a telephone and automatic attendant functionality (with paging and automatic answering features). Accordingly, when the caller enters the extension number or group extension number, the entered numbers are interpreted by the "*switching system*" to perform the selection or routing. As is well known, attendants, whether automated or not, send out over an intercom system (which is not generally embedded in the phones but speakers distributed throughout an office) a page to an employee or subscriber that is away from their telephone.

For example, with respect to "initiating a voice message", in one interpretation of Han, such voice message is initiated by the caller who enters the numbers including "a voice paging request number" which is "0000," as described in column 4, lines 63-65. In another interpretation, the "*switching system*" initiates the voice message by virtue of its operation to interpret the "a voice paging request number" and carry out functions related thereto. **Contrary** to either of the interpretations of Han, the "*first telephone*" of the present invention performs the selection by virtue of its operation in a "*multiline KSU-less telephone system.*"

Han performs paging by using a "*broadcasting unit 123*" wherein the "*broadcasting unit 123*" plays (reproduces) the voice message, as described in column 5, lines 35-40. Such operation is **contrary** to the present invention which states "*telephones in the group receive and play the voice message from the first telephone automatically.*" (Emphasis added) Moreover, Han is completely **devoid** of any description that "*telephones in the group receive and play the voice message from the first telephone.*" Instead, Han explicitly states in column 6, lines 30-36, that:

> *the broadcasting unit 123 being connected to the central line circuit 117 where a voice paging channel is established. The voice message from the caller is reproduced by the broadcasting unit 123.* (Emphasis added)

Furthermore, the "*first telephone*" of Han would be the "*telephone*" used by the caller connected to a Central Office. Such "*telephone*" is connected through the central office line circuit 117 having a central office line speech loop. It is **not possible**, to modify Han to be a "*multiline KSU-less telephone system*" that includes a "*first telephone*" connected to the Central Office site.

The Examiner acknowledges that Han **does not** teach a KSU-less system and a half-duplex channel for communications, as claimed. Therefore, the Examiner relies upon the Turnbull et al for the teaching of a KSU-less system.

Turnbull et al.

Turnbull et al. does teach a KSU-less system having intercom capability. More specifically, the intercom capability is described as taking place between stations 14 one being a master 70 and the other a slave 71. However, Turnbull et al. **does not** teach or describe (1) "*selecting a group of telephones in the KSU-less system;*" (2) "*the first telephone initiating a voice message to the group of telephones using the half duplex voice channel in response to a user request*;" and (3) "*telephones in the group receive and play the*

voice message from the first telephone automatically regardless of receiving user action and wherein after playing said voice message, one telephone in the group answering the first telephone initiates a two–way conversation with a user of said first telephone." (Emphasis added)

Furthermore, modifying Han with the teaching of Turnbull et al. would render the "s*ystem*" of Han **inoperable** since a "Central Office" would be incorporated in such "*KSU-less system.*" As is well known, telephones in a KSU-less multiline telephone are for small businesses or home systems with only a small number of telephone lines that can be simply interconnected to each other. Han is directed to a switching system technology.

Heep et al.

The Examiner relies on Heep et al. for a teaching of half-duplex or full-duplex features. However, in view of the above remarks with respect to Han and the combination of Han as modified by Turnball et al., the combination of Han in view of Turnbull et al. and Heep et al. **do not** teach all the claim limitations, as asserted by the Examiner.

Claim 15 is similar in scope as Claim 11. Thus, the arguments set forth above with regard to Claim 11 apply equally to Claim 15. In view of the foregoing remarks, amended Claims 11 and 15 are allowable over the combination of Han in view of Turnbull et al. and Heep et al. and the corresponding rejection under 35 USC 103(a) should be withdrawn. Since Claims 12-14 and 16-18 depend from independent Claims 11 and 15, respectively, then for the same reasons set forth above with regard to Claims 11 and 15, these dependent claims are also allowable over the combination of Han in view of Turnbull et al. and Heep et al. and the corresponding rejection under 35 USC 103(a) should be withdrawn.

CONCLUSION

In view of the foregoing remarks and amendments, the Applicant believes that they have overcome all of the Examiner's basis for rejection, and that this application therefore stands in condition for allowance. However, if the Examiner is of the opinion that such action cannot be taken, the Applicant requests that he contact their undersigned attorney in order to resolve any outstanding issues without the necessity of issuing another Office Action.

Respectfully submitted,

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